## COMMONWEALTH OF VIRGINIA OPERATING PERMIT STATIONARY SOURCE PERMIT TO MODIFY AND OPERATE

## This permit supersedes your permits dated July 13, 2006.

In compliance with the Federal Clean Air Act and the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution,

Alsco Metals Corporation 1801 Reymet Road Richmond, Virginia 23237-3794 Registration No. 50099 County-Plant ID No. 041-0012

is authorized to modify and operate

a secondary aluminum facility

located at

1801 Reymet Road Richmond, Virginia 23237-3794

in accordance with the Conditions of this permit.

Approved on June 28, 2007 Draft.

Robert J. Weld Deputy Regional Director

Permit consists of 17 pages Permit Conditions 1 to 68 <u>PERMIT CONDITIONS</u> - the regulatory reference and authority for each condition is listed in parentheses ( ) after each condition.

- Except as specified in this permit, the permitted facility is to be modified and operated as represented in the permit applications dated March 11, 1992, March 20, 1998, March 20, 1995, August 18, 1993, and April 27, 1989, including amendment sheets dated December 15, 1992, April 20, 1998, April 20, 2000, January 31, 2001, September 24, 2001, May 7, 2003, and November 25, 2003, October 2005, January 19, 2006 and August 17, 2006. Any changes in the permit application specifications or any existing facilities which alter the impact of the facility on air quality may require a permit. Failure to obtain such a permit prior to construction may result in enforcement action. (9 VAC 5-80-850, 9 VAC 5-170-160 of State Regulations)
- Existing equipment consists of:
  - One (1) melting furnace and chargewell # 1 (Ref. No. MF1) rated at 7.0 tons aluminum charged per hour with natural gas/#2 oil/propane Bloom Engineering Ultra 3 Low-Nox Burner and Regenerative Bed rated at 20 MM BTU per hour with the chargewell controlled by a 225,000 cfm Mikra Pulsaire baghouse, a Wheelabrator baghouse and a Fuller baghouse.
  - One (1) melting furnace and charge well # 2 (Ref. No. MF2) rated at 7.0 tons aluminum based material charged per hour with natural gas/#2 oil/propane Bloom Engineering Ultra 3 Low-Nox Burner and Regenerative Bed rated at 20 MM BTU per hour with the chargewell controlled by a 225,000 cfm Mikra Pulsaire baghouse, a Wheelabrator baghouse and a Fuller baghouse.
  - One (1) melting furnace and chargewell # 3 (Ref. No. MF3) rated at 8.0 tons aluminum charged per hour with natural gas/# 2 oil/propane Bloom Engineering Ultra 3 Low-Nox Burner and Regenerative Bed rated at 24 MM BTU per hour with the chargewell controlled by a 225,000 cfm Mikra Pulsaire baghouse, a Wheelabrator and a Fuller baghouse.
  - One (1) General Electric furnace (Ref. No. GE) rated at 35 tons aluminum charged per hour with natural gas/propane burner rated at 21 MM BTU per hour.
  - One (1) 500,000 pound aluminum pellet storage silo
  - One (1) holding furnace (Ref. No. HF) rated at 28.5 tons aluminum charged per hour with natural gas/propane burner rated at 12 MM BTU per hour

- One (1) Cold Rolling Mill (Ref. No. CRM-1) rated at 32 tons per hour of rolled sheet aluminum
- Two (2) annealing furnaces with natural gas/propane burners rated at 20 MM BTU per hour each
- One (1) 2,593 cubic feet lime storage silo with a baghouse (LS-2), rated at 300 lb/hr
- One (1) 3,704 cubic feet lime storage silo with a baghouse (LS-1), rated at 250 lb/hr
- 3. Volatile organic compound emissions from the cold rolling mill (Ref. No. CRM-1) shall be controlled by a Busch-Anderson liquid particulate removal unit. The Busch Anderson liquid particulate removal unit shall have a VOC reduction efficiency of 99%. The Busch-Anderson unit shall be provided with pressure gauges to determine the differential pressure across the unit. The Busch-Anderson unit and exhaust stack shall be provided with adequate access for inspection.
  (9 VAC 5-80-850, and 9 VAC 5-50-260 of State Regulations)
- 4. Total suspended particulate emissions from the chargewells of the melter furnaces (Ref. Nos. 1, 2, and 3) shall be controlled by a collection system and fabric filter. The collection system and fabric filter shall be provided with adequate access for inspection. The fabric filter shall be equipped with a device to continuously measure the differential pressure drop across the fabric filter. The device shall be installed in an accessible location and shall be maintained by the permittee such that it is in proper working order at all times. (9 VAC 5-80-850 and 9 VAC 5-50-260 of State Regulations)
- 5. Particulate emissions from loading each storage silo (LS-1, LS-2) shall be controlled by a baghouse on each silo. The baghouse on each silo shall be provided with adequate access for inspection. The fabric filter on each baghouse shall be equipped with a device to continuously measure the differential pressure drop across the fabric filter. The device on each baghouse shall be installed in an accessible location and shall be maintained by the permittee such that it is in proper working order at all times.
  (9 VAC 5-80-850 and 9 VAC 5-50-260 of State Regulations)
- 6. The approved fuels for the melting furnace # 1 are natural gas, # 2 fuel oil and propane. A change in these fuels may require a permit to modify and operate.

  (9 VAC 5-80-850, 9 VAC 5-170-160 of State Regulations)

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- 7. The approved fuels for the melting furnace # 2 are natural gas, # 2 fuel oil and propane. A change in these fuels may require a permit to modify and operate.

  (9 VAC 5-80-850, 9 VAC 5-170-160 of State Regulations)
- 8. The approved fuels for the melting furnace #3 are natural gas, #2 fuel oil, and propane. A change in these fuels may require a permit to modify and operate. (9 VAC 5-80-850, 9 VAC 5-170-160 of State Regulations)
- The approved fuels for the holding furnace are natural gas and propane. A change in these fuels may require a permit to modify and operate.
   (9 VAC 5-80-850, 9 VAC 5-170-160 of State Regulations)
- The approved fuels for the General Electric furnace are natural gas and propane. A change in these fuels may require a permit to modify and operate.
   (9 VAC 5-80-850, 9 VAC 5-170-160 of State Regulations)
- 11. The approved fuels for the annealing furnaces are natural gas and propane. A change in the fuel may require a permit to modify and operate.(9 VAC 5-80-850, 9 VAC 5-170-160 of State Regulations)
- 12. The permitted facility shall be constructed so as to allow for emissions testing and monitoring upon reasonable notice at any time, using appropriate methods. Test ports shall be provided at the appropriate locations.

  (9 VAC 5-80-850, 9 VAC 5-50-30 F of State Regulations)
- 13. The Cold Rolling Mill shall process no more than 280,320 tons per year of rolled aluminum product, calculated monthly as the sum of each consecutive 12 month period. (9 VAC 5-80-850, 9 VAC 5-170-160 of State Regulations)
- 14. The melting furnace # 1 shall consume no more than 175 million cubic feet per year of natural gas, 311 thousand gallons per year of #2 fuel oil, nor 1,243 thousand gallons of propane, calculated as the sum of each consecutive 12 month period.

  (9 VAC 5-80-850, 9 VAC 5-170-160 of State Regulations)
- 15. The melting furnace # 2 shall consume no more than 175 million cubic feet per year of natural gas, 721 thousand gallons per year of #2 fuel oil, nor 1,243 thousand gallons of propane, calculated as the sum of each consecutive 12 month period.

  (9 VAC 5-80-850, 9 VAC 5-170-160 of State Regulations)

- 16. The melting furnace # 3 shall consume no more than 204 million cubic feet per year of natural gas, 746 thousand gallons per year of #2 fuel oil, nor 1,492 thousand gallons of propane, calculated as the sum of each consecutive 12 month period.

  (9 VAC 5-80-850, 9 VAC 5-170-160 of State Regulations)
- 17. The holding furnace shall consume no more than 102 million cubic feet per year of natural gas, nor 746 thousand gallons of propane, calculated as the sum of each consecutive 12 month period.

(9 VAC 5-80-850, 9 VAC 5-170-160 of State Regulations)

18. The General Electric furnace shall consume no more than 213 million cubic feet per year of natural gas, nor 1554 thousand gallons of propane, calculated as the sum of each consecutive 12 month period.

(9 VAC 5-80-850, 9 VAC 5-170-160 of State Regulations)

19. The throughput of aluminum scrap to the melting furnace and charge well # 1 shall not exceed 7.0 tons per hour nor 61,320 tons per year, calculated as the sum of each consecutive 12 month period.

(9 VAC 5-80-850, 9 VAC 5-170-160 of State Regulations)

20. The throughput of aluminum scrap to the melting furnace and charge well # 2 shall not exceed 7.0 tons per hour nor 61,320 tons per year, calculated as the sum of each consecutive 12 month period.

(9 VAC 5-80-850, 9 VAC 5-170-160 of State Regulations)

21. The throughput of aluminum scrap to the melting furnace and charge well # 3 shall not exceed 8.0 tons per hour nor 70,080 tons per year, calculated as the sum of each consecutive 12 month period.

(9 VAC 5-80-850, 9 VAC 5-170-160 of State Regulations)

22. The two annealing furnaces shall consume no more than a total of 166 million cubic feet per year of natural gas nor 1,134 thousand gallons of propane, calculated as the sum of each consecutive 12 month period. The annual heat input from the two annealing furnaces shall not exceed 166,000 million Btu, calculated as the sum of each consecutive 12 month period.

(9 VAC 5-170-160 of State Regulations)

23. The annual throughput of lime to the 3,704 cubic feet storage silo (LS-1) shall not exceed 1,144 tons, calculated as the sum of each consecutive 12 month period.

(Section 5-170-160 of State Regulations)

- 24. The annual throughput of lime to the 2,593 cubic feet storage silo (LS-2) shall not exceed 1,372 tons, calculated as the sum of each consecutive 12 month period. (Section 5-170-160 of State Regulations)
- 25. The sulfur content of the oil to be burned in the melting furnace #1, #2 and #3 shall not exceed 0.30 percent by weight per shipment. The permittee shall maintain records (supplier fuel analysis) of all oil shipments purchased. These records shall be available for inspection by the DEQ. Such records shall be current for the most recent five years (9 VAC 5-80-850, 9 VAC 5-170-160 of State Regulations)
- Visible Emission Evaluations (VEE) in accordance with 40 CFR, Part 60, Appendix A, Method 9, shall be conducted on the fabric filter baghouses serving the Melting Furnace #3 Chargewell. This test shall be performed while each chargewell is operating at least 70 percent of its hourly capacity. Each test shall consist of ten (10) sets of twenty-four (24) consecutive observations (at fifteen second intervals) to yield a six (6) minute average. The details of the tests are to be arranged with Director, Piedmont Regional Office. The evaluation shall be performed within sixty (60) days of achieving maximum operation, but no later than 180 days after initiation of the modification. Three copies of the test result shall be submitted to the Director, Piedmont Regional Office within 45 days after test completion and shall conform to the test report format enclosed with this permit. (9 VAC 5-80-850, 9 VAC 5-170-160 and 9 VAC 5-50-30 of State Regulations)
- 28. A continuous opacity monitoring system may be used to satisfy visible emission initial performance compliance in lieu of Test Method 9 Reported test data is to include averages of all six (6) minute continuous periods (9 VAC 5-80-850, 9 VAC 5-170-160 of State Regulations)
- 29. Emissions from the operation of the Cold Rolling Mill due to rolling oils shall not exceed the limitations specified below

Volatile Organic Compounds

9.0 lbs/hr

38.2 tons/yr

The emissions limits contained in this condition are for inventory purposes only. Compliance for this unit should be determined by compliance with condition 20 below. (9 VAC 5-80-850, 9 VAC 5-50-260 and 9 VAC 5-50-180 of State Regulations)

30. Emissions from the operation of the melting furnace # 1 process fuel burner shall not exceed the limits specified below:

Total Suspended Particulate	0.28 lbs/hr	0.67 tons/yr
PM10	0.15 lbs/hr	0.67 tons/yr
Sulfur Dioxide	6.04 lbs/hr	6.62 tons/yr
Nitrogen Oxides (as NOx)	4.15 lbs/hr	11.81 tons/yr
Carbon Monoxide	1.63 lbs/hr	7.35 tons/yr
Volatile Organic Compounds (non-methane)	0.11 lbs/hr	0.48 tons/yr

(9 VAC 5-80-850, 9 VAC 5-50-260 and 5-50-180 of State Regulations)

31. Emissions from the operation of the melting furnace # 1 chargewell shall not exceed the limits specified below:

Total Suspended Particulate	4.77 lbs/hr	20.90 tons/yr
PM10	2.88 lbs/hr	12.63 tons/yr

(9 VAC 5-80-850, 9 VAC 5-50-260 and 5-50-180 of State Regulations)

32. Emissions from the operation of the melting furnace # 2 process fuel burner shall not exceed the limits specified below:

Total Suspended Particulate	0.28 lbs/hr	0.95 tons/yr
PM-10	0.28 lbs/hr	0.95 tons/yr
Sulfur Dioxide	6.04 lbs/hr	15.36 tons/yr
Nitrogen Oxides (as N02)	4.14 lbs/hr	11.81 tons/yr

Carbon Monoxide	1.63 lbs/hr	7.35 tons/yr
Volatile Organic Compounds (non-methane)	0.11 lbs/hr	0.48 tons/yr
(9 VAC 5-80-850, 9 VAC 5-50-260 and 5-50-180 of State Regulations)		

33. Emissions from the operation of the No. 2 melting furnace chargewell shall not exceed the limits specified below:

**Total Suspended** 

Particulate 4.77 lbs/hr 20.90 tons/yr

PM-10 2.88 lbs/hr 12.63 tons/yr

(9 VAC 5-80-850, 9 VAC 5-50-260 and 5-50-180 of State Regulations)

34. Emissions from the operation of the melting furnace # 3 process fuel burner shall not exceed the limits specified below:

Total Suspended Particulate	0.34 lbs/hr	0.78 tons/yr
PM10	0.34 lbs/hr	0.78 tons/yr
Sulfur Dioxide	7.25 lbs/hr	15.89 tons/yr
Nitrogen Oxides (as NOx)	4.98 lbs/hr	14.17 tons/yr
Carbon Monoxide	1.96 lbs/hr	8.57 tons/yr
Volatile Organic Compounds (non-methane)	0.13 lbs/hr	0.56 tons/yr

(9 VAC 5-80-850, 9 VAC 5-50-260 and 5-50-180 of State Regulations)

35. Emissions from the operation of the melting furnace # 3 chargewell shall not exceed the limits specified below:

Total Suspended Particulate	5.45 lbs/hr	23.88 tons/yr
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PM10	3.30 lbs/hr	14.44 tons/yr

(9 VAC 5-80-850, 9 VAC 5-50-260 and 5-50-180 of State Regulations)

36. Emissions from the operation of the holding furnace process fuel burner shall not exceed the limits specified below:

Total Suspended Particulate	0.09 lbs/hr	0.39 tons/yr
PM10	0.09 lbs/hr	0.39 tons/yr
Sulfur Dioxide	0.13 lbs/hr	0.37 tons/yr
Nitrogen Oxides (as NOx)	2.49 lbs/hr	7.09 tons/yr
Carbon Monoxide	0.98 lbs/hr	4.28 tons/yr
Volatile Organic Compounds (non-methane)	0.06 lbs/hr	0.28 tons/yr

(9 VAC 5-80-850, 9 VAC 5-50-260 and 5-50-180 of State Regulations)

37. Emissions from the operation of the General Electric furnace process fuel burner shall not exceed the limits specified below:

Total Suspended Particulate	0.15 lbs/hr	0.81 tons/yr
PM10	0.15 lbs/hr	0.81 tons/yr
Sulfur Dioxide	0.23 lbs/hr	0.78 tons/yr
Nitrogen Oxides (as NOx)	4.36 lbs/hr	14.76 tons/yr
Carbon Monoxide	1.71 lbs/hr	8.95 tons/yr
Volatile Organic Compounds	0.11 lbs/hr	0.59 tons/yr

(non-methane)

(9 VAC 5-80-850, 9 VAC 5-50-260 and 5-50-180 of State Regulations)

38. Total emissions from the operation of both of the two annealing furnaces process fuel burners shall not exceed the limits specified below

Total Suspended Particulate	0.29 lbs/hr	0.63 tons/yr
PM-10	0.29 lbs/hr	0.63 tons/yr
Sulfur Dioxide	0.44 lbs/hr	0.57 tons/yr
Nitrogen Oxides (as N02)	8.29 lbs/hr	10.77 tons/yr
Carbon Monoxide	3.26 lbs/hr	6.97 tons/yr
Volatile Organic Compounds (non-methane)	0.22 lbs/hr	0.46 tons/yr

(9 VAC 5-80-850, 9 VAC 5-50-260 and 5-50-180 of State Regulations)

39. Emissions from the operation of the annealing furnaces due to rolling oils shall not exceed the limits specified below:

Volatile Organic

Compounds 1.1 lb/hr/unit 4.8 tons/yr/unit

The emissions limits contained in this condition are for inventory purposes only. Compliance for these unit should be determined by compliance with condition 22 above (9 VAC 5-80-850, 9 VAC 5-50-260 and 5-50-180 of State Regulations)

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40. Emissions from the operation of the Cold Rolling Mill and the Annealing Furnaces due to rolling oils shall not exceed the limits specified below:

Volatile Organic

Compounds 11.2 lb/hr 47.8 tons/yr (9 VAC 5-80-850, 9 VAC 5-50-260 and 5-50-180 of State Regulations)

41. Emissions from loading the 3,704 cubic feet storage silo (LS-1) shall not exceed the limits specified below:

**Total Suspended** 

Particulate 1.8 lbs/hr 0.5 tons/yr

PM10 1.8 lbs/hr 0.5 tons/yr

The emissions limits contained in this condition are for inventory purposes only. Compliance for these unit should be determined by compliance with condition 23 above (9 VAC 5-80-850, 9 VAC 5-50-260 and 5-50-180 of State Regulations)

42. Emissions from loading the 2,593 cubic feet storage silo (LS-2) shall not exceed the limits specified below:

**Total Suspended** 

Particulate 2.2 lbs/hr 0.5 tons/yr

PM10 2.2 lbs/hr 0.5 tons/yr

The emissions limits contained in this condition are for inventory purposes only. Compliance for these unit should be determined by compliance with condition 24 above (9 VAC 5-80-850, 9 VAC 5-50-260 and 5-50-180 of State Regulations)

43. Hazardous air pollutant (HAP) emissions, as defined by Section 112 (b) of the Clean Air Act, from the facility shall not exceed 10 tons per year of any individual HAP or 25 tons per year of any combination, calculated monthly as the sum of each consecutive 12-month period. HAPs which are not accompanied by a specific CAS number shall be calculated as the sum of all compounds containing the named chemical when determining compliance with the individual HAP emission limitation of 10 tons per year. (9 VAC 5-80-850)

- 44. Visible emissions from the Busch-Anderson Unit shall not exceed 5 percent opacity.(9 VAC 5-80-850, 9 VAC 5-170-160 and 9 VAC 5-50-20 of State Regulations)
- 45. Visible emissions from melting furnace #3 and the annealing furnaces fuel burning equipment exhausts shall not exceed 10 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A) (9 VAC 5-80-850, 9 VAC 5-170-160 and 9 VAC 5-50-20 of State Regulations)
- Visible emissions from the No. 2 Melting Furnace fuel burning equipment exhaust shall not exceed 10 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).
  (9 VAC 5-80-850, 9 VAC 5-170-160 and 9 VAC 5-50-20 of State Regulations)
- 47. Visible emissions from the No. 2 Melting Furnace Chargewell baghouse exhausts shall not exceed 10 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).
  (9 VAC 5-80-850, 9 VAC 5-170-160 and 9 VAC 5-50-20 of State Regulations)
- 48. Visible emissions from the baghouse of each storage silo (LS-1, LS-2) shall not exceed five percent (5%) opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). (9 VAC 5-80-850, 9 VAC 5-170-160 and 9 VAC 5-50-20 of State Regulations)
- 49. The permittee shall furnish written notification to the Director, Piedmont Regional Office of:
  - a. The actual date on which modification of the Cold Rolling Mill commenced within 10 days after such date
  - b. The anticipated date of performance tests of the Busch-Anderson unit postmarked at least thirty (30) days prior to such date

(9 VAC 5-80-850, 9 VAC 5-170-160 of State Regulations)

- 50. The permittee shall furnish written notification to the Director, Piedmont Regional Office of:
  - a. The actual date on which modification of the General Electric furnace (Ref. No. GE) commenced within 10 days after such date.

b. The actual start-up date of the modified General Electric furnace (Ref. No. GE) within 10 days after such date.

(9 VAC 5-80-850, 9 VAC 5-170-160 of State Regulations)

- 51. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content of and format of such records shall be arranged with the Director, Piedmont Region. These records shall include, but are not limited to:
  - a. The yearly throughput of aluminum through the cold rolling mill, calculated monthly as the sum of each consecutive 12 month period.
  - b. The yearly consumption of rolling oil, calculated monthly as the sum of each consecutive 12 month period.
  - c. Material balance information sufficient to demonstrate compliance with the emissions limitations described in condition 29 above.

These records shall be available for inspection by the DEQ and shall be current for the most recent five (5) years (9 VAC 5-80-850, 9 VAC 5-50-50 of State Regulations)

- 52. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content of and format of such records shall be arranged with the Director, Piedmont Regional Office. These records shall include, but are not limited to:
  - a. The yearly throughput of aluminum scrap to the Melting Furnaces #1, #2 and #3 Chargewell, calculated as the sum of each consecutive 12 month period.
  - b. The hourly throughput of aluminum scrap to the Melting Furnaces #1, #2 and #3 Chargewell, calculated as the monthly throughput divided by the monthly hours of operation.
  - c. The annual consumption of natural gas, #2 fuel oil, and propane for #1, #2 and #3, calculated as the sum of each consecutive 12 month period.
  - d. The annual consumption of natural gas and propane for the annualing furnaces, calculated as the sum of each consecutive 12 month period.

- e. The annual heat input, in million BTU, of the two annealing furnaces, calculated as the sum of each consecutive 12 month period.
- f. Oil consumption for the #3 remelt furnace along with the number of hours oil is used. These records shall be available for inspection by the DEQ and shall be current for the most recent five (5) years.
- g. The yearly emissions from each fuel consumed in melting furnaces # 1, #2 and # 3, the holding furnace, the General Electric furnace and the two annealing furnaces to demonstrate compliance with the emission limits in permit conditions 30, 31, 32, 33, 34, 35, 36, 37, 38 and 39, calculated as the sum of each consecutive 12 month period.

(9 VAC 5-80-850, 9 VAC 5-50-50 of State Regulations)

- 53. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content of and format of such records shall be arranged with the Director, Region 5. These records shall include, but are not limited to:
  - a. The yearly throughput of lime though each storage silo (LS-1, LS-2), calculated as the sum of each consecutive 12 month period.
  - b. Scheduled and unscheduled maintenance records for the air pollution control equipment of each storage silo (LS-1, LS-2).
  - c. Inventory of spare parts to minimize durations of air pollution control equipment breakdowns of each storage silo (LS-1, LS-2).
  - d. Written operating procedures for the air pollution control equipment of each storage silo (LS-1, LS-2).
  - e. Operator training records. (9 VAC 5-80-850, 9 VAC 5-50-50 of State Regulations)
- 54. Visible Emission Evaluations (VEE) in accordance with 40 CFR, Part 60, Appendix A, Method 9, shall be conducted on the fabric filter baghouses serving the lime storage silo (LS-2). This test shall be performed while the lime storage silo (LS-2) is operating at least 80 percent of its hourly capacity. Each test shall consist of ten (10) sets of twenty-four (24) consecutive observations (at fifteen second intervals) to yield a six (6) minute average. The details of the tests are to be arranged with Director, Piedmont Regional

Office. The evaluation shall be performed within sixty (60) days of achieving maximum operation, but no later than 180 days after initiation of the modification. Three copies of the test result shall be submitted to the Director, Piedmont Regional Office within 45 days after test completion and shall conform to the test report format enclosed with this permit. (9 VAC 5-80-850, 9 VAC 5-50-50 of State Regulations)

- 55. This permit may be modified or revoked in whole or in part for cause, including, but not limited to, the following
  - a. Violation of any terms or conditions of this permit,
  - b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts.
  - c. A change in any condition that requires either a temporary or permanent reduction or elimination of a permitted discharge, or
  - d. Information that the permitted discharge of any pollutant poses a threat to human health, welfare, or the environment.
  - (9 VAC 5-80-1010, 9 VAC 5-170-160 and of State Regulations)
- 56. Except as specified in this permit, the facility shall be operated in compliance with 40 CFR 63 Subpart RRR, National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production. (9 VAC 5-60-100)
- The permittee shall maintain a 3-hour block average inlet temperature for each fabric filter at or below the average temperature established during the performance test, plus 14 C (plus 25 F) (40 CFR 63.1506(m)(3), 9 VAC 5-60-100)
- The permittee shall develop an operations and maintenance plan for the facility. (40 CFR 63.1506(b)(2), 9 VAC 5-60-100)
- 59. Upon the request by DEQ, the permittee shall conduct an additional performance test for hydrochloric acid (HCL) to demonstrate that the facility does not emit more than ten (10) tons of HCL per year. The details of the test shall be arranged with the Director, Piedmont Regional Office.
  - (9 VAC 5-80-1200, 9 VAC 5-50-30-G, 9 VAC 5-60-100)

- 60. The permittee shall allow authorized local, state and federal representatives, upon the presentation of credentials:
  - a. To enter upon the permittee's premises on which the facility is located or in which any records are required to be kept under the terms and conditions of this permit,
  - To have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit or the State Air Pollution Control Board Regulations,
  - To inspect at reasonable times any facility, equipment, or process subject to the terms and conditions of this permit or the State Air Pollution Control Board Regulations, and
  - d. To sample or test at reasonable times.

For purposes of this condition, the time for inspection shall be deemed reasonable during regular business hours or whenever the facility is in operation. Nothing contained herein shall make an inspection time unreasonable during an emergency. (9 VAC 5-80-850, 9 VAC 5-170-160 of State Regulations)

- 61. If, for any reason, the permitted facility or related air pollution control equipment fails or malfunctions and may cause excess emissions for more than one hour, the owner shall notify the Director, Piedmont Regional Office within four (4) business hours of the occurrence. The portion of the facility which is subject to the provision of Rule 4-3 (9 VAC 5-40-160 et seq) or 5-3 (9 VAC 5-50-160 et seq) (toxics) shall shut down immediately upon request of the DEQ. In addition, the owner shall provide a written statement, within 14 days, explaining the problem, corrective action taken, and the estimated duration of the breakdown/shut down.
  - (9 VAC 5-20-180 of State Regulations)
- 62. In order to minimize the duration and frequency of excess emissions due to malfunctions of process equipment or air pollution control equipment, the permittee shall:
  - a. Develop a maintenance schedule and maintain records of all scheduled and nonscheduled maintenance. These records shall be maintained on site for a period of five (5) years and shall be made available to DEQ personnel upon request.
  - b. Maintain an inventory of spare parts that are needed to minimize duration of air pollution control equipment breakdowns.

(9 VAC 5-170-160 and 9 VAC 5-50-40 of State Regulations)

63. The permittee shall have available written operating procedures for the related air pollution control equipment. Operators shall be trained in the proper operation of all such equipment and shall be familiar with the written operating procedures. These procedures shall be based on the manufacturer's recommendations, at minimum. The permittee shall maintain records of training provided including names of trainees, date of training and nature of training.

(9 VAC 5-80-850, 9 VAC 5-170-160 of State Regulations)

64. This permit shall become invalid if modification of the Cold Rolling Mill is not commenced within eighteen (18) months of the date of this permit or if it is discontinued for a period of eighteen (18) months.

(9 VAC 5-80-940, 9 VAC 5-170-160 of State Regulations)

- 65. This permit shall become invalid if modification of the General Electric furnace (Ref. No. GE) is not commenced within eighteen (18) months of the date of this permit or if it is discontinued for a period of eighteen (18) months.

  (9 VAC 5-80-940, 9 VAC 5-170-160 of State Regulations)
- 66. In the event of any change in control of ownership of the permitted source, the permittee shall notify the succeeding owner of the existence of this permit by letter and send a copy of that letter to the Director, Piedmont Region.

  (9 VAC 5-80-850, 9 VAC 5-170-160 of State Regulations)
- 67. Annual requirements to fulfill legal obligations to maintain current stationary source emissions data will necessitate your prompt response to requests for information to include, as appropriate process and production data, changes in control equipment, and operating schedules. Such requests for information from the DEQ will either be in writing or by personal contact. The availability of information submitted to the DEQ or the Board will be governed by applicable provisions of the Freedom of Information Act, Section 2 1-340 through 2 1-348 of the Code of Virginia, Section 10 1-1314 (addressing information provided to the Board), and 9 VAC 5-170-60 of the State Air Pollution Control Board Regulations. Information provided to federal officials is subject to appropriate federal law and regulations governing confidentiality of such information. (9 VAC 5-20-160 of State Regulations)
- 68. A copy of this permit shall be maintained on the premises of the facility to which it applies. (9 VAC 5-80-850, 9 VAC 5-170-160 of State Regulations)

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